



Hyundai Motor America

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April 23, 2010

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket, No. 07-293, IB Docket No. 95-91, GEN Docket No. 90-357,
and RM No. 8610

Dear Ms. Dortch:

Hyundai Motor America to express its concern with the recently proposed changes to the WCS service rules.¹ In our previous filings in this proceeding, we said that allowing mobile transmissions in the WCS band creates a significant risk of interference to in-vehicle reception and we asked the Commission to invite comment on specific proposals before it modifies the WCS rules.

We appreciate this opportunity to provide this further input. However, we strongly disagree with the staff's current proposal, which disregards extensive evidence in the record demonstrating that absent effective safeguards, satellite radio reception will be degraded by WCS mobile operations. Sirius XM has spent billions of dollars developing networks that are based on its reasonable expectation that the Commission would not allow mobile WCS devices. Automakers have installed tens of millions of satellite radios in their vehicles with that same understanding.

If the Commission loosens the WCS rules, it should also adopt provisions that will effectively protect satellite radio listeners who experience interference from WCS operations. As an integral part of modified WCS rules, the Commission should require any WCS operator causing interference to satellite radio to promptly eliminate the interference or discontinue its operations. The Commission should also adopt a streamlined process to ensure that consumers have an effective remedy if the situation requires government intervention.

¹ Commission Staff Requests That Interested Parties Supplement the Record On Draft Interference Rules For Wireless Communications Service and Satellite Digital Audio Radio Service (DA 10-592, released April 2, 2010). The deadline for filing comments has been extended to April 23, 2010.



Other automobile manufacturers and trade associations have already gone on record in this proceeding with similar concerns. Our common position reflects the importance of satellite radio to our customers and the challenges WCS rule changes would present to us, just at the time we are all working to recover from the economic recession. We hope any revisions to the WCS rules will fully protect the millions of consumers who rely on satellite radio in their automobiles.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Ferrara".

Frank T. Ferrara
Executive Vice President
Corporate Planning and
Customer Satisfaction

cc: The Honorable Julius Genachowski
The Honorable Michael J. Copps
The Honorable Robert M. McDowell
The Honorable Mignon Clyburn
The Honorable Meredith Attwell Baker
Mr. Julius Knapp